



DLA Piper LLP (US)

51 John F. Kennedy Parkway, Suite 120
Short Hills, New Jersey 07078-2704
www.dlapiper.com

B. John Pendleton, Jr.
john.pendleton@dlapiper.com

T 973.520.2561

F 973.520.2581

Partners Responsible for Short Hills Office:

Andrew P. Gilbert

Michael E. Helmer

October 12, 2016

VIA ECF

Honorable Lois H. Goodman
Magistrate, U.S. District Court
Clarkson S. Fisher Federal Building & U.S. Courthouse
Room 7050
402 E. State Street
Trenton, NJ 08608

Re: Tawil v. Illinois Tool Works Inc., et. al.
Case No. 3:15-cv-08747-FLW-LHG

Dear Magistrate Judge Goodman:

We represent Defendants Illinois Tool Works Inc. and South/Win Ltd. (collectively "Defendants") in this case.

First, please allow us to apologize for inadvertently neglecting to include a showing of good cause in our proposed Stipulation Extending the Time to Answer in this matter.

The parties requested an extension of time until November 10, 2016, by which Defendants were to file an Answer, so that the parties could continue to discuss resolution of this matter. The request was made in order to avoid unnecessary expense in the event the parties are able to work out a mutually amicable resolution.

Accordingly, please accept this letter request and the attached Stipulation which we respectfully request that your Honor reconsider in light of the above.

Respectfully,

DLA Piper LLP (US)

/s B. John Pendleton, Jr.

B. John Pendleton, Jr.

BJP:pb
Attachment

cc: All Counsel of Record (Via ECF)



Honorable Lois H. Goodman
October 12, 2016
Page Two

EAST\134734704.1